

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KIPP ACADEMY CHARTER SCHOOL

Plaintiff,

-against-

UNITED FEDERATION OF TEACHERS, AFT NYSUT,
AFL-CIO,

Defendant.

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NOTICE OF MOTION

Case No. 17-cv-01863 (DAB)

PLEASE TAKE NOTICE that Plaintiff KIPP Academy Charter School (“KIPP”) will move this Court, before the Honorable Deborah A. Batts, on the 27th day of April, 2017, at 9:30 a.m., or at such other date and time fixed by the Court, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 24B, New York, New York 10007, for an Order granting a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, staying the arbitration filed by the Defendant with the American Arbitration Association, scheduled for June 14, 2017, because KIPP will suffer irreparable harm if the arbitration is not stayed and it demonstrates a likelihood of success, or serious questions for litigation are raised by its complaint and the balance of hardships tips sharply in its favor.

In support of this motion, KIPP shall rely upon the accompanying Memorandum of Law in Support of Plaintiff’s Motion to Stay Arbitration, together with the Declarations of Frank Corcoran, Alicia Johnson and Michael P. Collins, and the exhibits annexed thereto.

Dated: New York, New York
April 5, 2017

Respectfully submitted,
BOND, SCHOENECK & KING, PLLC

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